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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**RAMA SOU; TAI BUI; and
SCOTT ZIMMERMAN,**

Plaintiffs,

v.

**MICHAEL BASH; JEREMY
BASH; BERKLEY
ENTERPRISES, INC.;
PEPPERDINE ENTERPRISES,
INC.; NINETY-FIVE FORT
APACHE COMPLEX, LLC;
ROYAL VIEW, LLC; and DOES 1
through 20, inclusive,**

Defendants

Case No. 2:15-cv-00698-APG-VCF

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO STRIKE AND
REPLACE EXHIBITS**

[LR IC 6-1]

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR
2 COUNSEL OF RECORD:

3 Plaintiffs Rama Sou, Tai Bui, and Scott Zimmerman (collectively,
4 “Plaintiffs”), on the one hand, and defendants Michael Bash, Jeremy Bash,
5 Berkley Enterprises, Inc., Pepperdine Enterprises, Inc., Ninety-Five Fort Apache
6 Complex, LLC, and Royal View, LLC (collectively, “Defendants”), on the other
7 hand, by and through their respective counsel, hereby stipulate as follows:

8 WHEREAS, on March 20, 2017, Plaintiffs filed a Motion for Summary
9 Judgment against Jeremy Bash, and included certain exhibits with the Motion;

10 WHEREAS, on April 7, 2017, Defendants’ counsel brought to Plaintiffs’
11 counsel’s attention that certain exhibits contained information that should have
12 been redacted;

13 WHEREAS, in light of the aforesaid, and in the interests of equity and
14 judicial economy, the parties agree to allow Plaintiffs to strike the non-compliant
15 exhibits and to replace the exhibits with those that have been properly redacted;

16 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the
17 parties, through their respective counsel of record, that good cause exists and it is
18 in the best interests of all parties that:

19 (1) ECF Docket ~~103-18~~ and ~~103-26~~ shall be ^{sealed} ~~struck~~, and replaced by the
20 _{103-18 103-28} redacted exhibits attached hereto.

21
22 IT IS SO STIPULATED.

23
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25 Dated: April 17, 2017

LAW OFFICES OF MICHAEL K. SUH &
ASSOCIATES

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28 By: /s/ Edward W. Suh
Edward W. Suh

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Attorneys for Plaintiffs
Rama Sou, Tai Bui, and Scott
Zimmerman

Dated: April 17, 2017

LAW OFFICE OF ANDREW H.
PASTWICK L.L.C.

By: /s/ Andrew H. Pastwick

Andrew H. Pastwick
NV Bar No. 009146
LAW OFFICE OF ANDREW H.
PASTWICK L.L.C.

Attorneys for Defendants
Michael Bash, Jeremy Bash, Berkley
Enterprises, Inc., Pepperdine Enterprises,
Inc., Ninety-Five Fort Apache Complex,
LLC, and Royal View, LLC

The Clerk of Court is directed to seal ECF Nos. 103-18 and 103-26 and replace them with the
redacted exhibits attached in ECF No. 107.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 4-10-2017